

**EXHIBIT 9**

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**From:** Knudson, Jacquelyn Swanner  
**Sent:** Monday, November 23, 2020 1:39 PM  
**To:** donald@creadorelawfirm.com; 'Harold D. Israel'; apreis@akingump.com; Brauner, Sara; Salwen, James; Kevin Thompson; Scott Bickford; Kent Robbins; Will Kovalchik; Scott Markowitz; Hurley, Mitchell; Porter, Katherine; Sheila.Birnbaum@dechert.com; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Yeary, Michelle  
**Cc:** McClammy, James I.; Oluwole, Chautney M.; Townes, Esther C.  
**Subject:** RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237] CORRECTION PLEASE

Donald—

First, based on the information available to us, we understand that all of the documents in the Bates range PDD8002000001 to PDD8002219555 should be related to the OxyContin INDIA.

Second, we have no objection to you working with the UCC to run your search terms over the Debtors' productions to the UCC so long as (i) we are made aware of any documents the UCC provides to the NAS Committee and (ii) no documents subject to the common interest between the Debtors and the UCC are produced without our express consent.

Third, IAC counsel is Marc Hirschfield of Royer Cooper Cohen Braunfeld. His email is [MHirschfield@rccblaw.com](mailto:MHirschfield@rccblaw.com).

Best,  
Jacquelyn

**Jacquelyn Swanner Knudson**

**Davis Polk & Wardwell LLP**

450 Lexington Avenue | New York, NY 10017  
+1 212 450 3341 tel | +1 803 417 3273 mobile  
[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)

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**From:** donald@creadorelawfirm.com <donald@creadorelawfirm.com>

**Sent:** Saturday, November 21, 2020 4:27 PM

**To:** McClammy, James I. <james.mcclammy@davispolk.com>; 'Harold D. Israel' <hisrael@lplegal.com>; Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>; apreis@akingump.com; Brauner, Sara <sbrauner@akingump.com>; Salwen, James <jsalwen@akingump.com>; Kevin Thompson <kwthompsonwv@thompsonbarneylaw.com>; Scott Bickford <sbickford@mbfirm.com>; Kent Robbins <khrobbins@kentharrisonrobbins.com>; Will Kovalchik <willkoval@gmail.com>; Scott Markowitz <smarkowitz@tarterkrinsky.com>; Hurley, Mitchell <mhurley@akingump.com>; Porter, Katherine <kporter@akingump.com>; Sheila.Birnbaum@dechert.com; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Yeary, Michelle <michelle.yeary@dechert.com>

**Cc:** don creadore <Donald@creadorelawfirm.com>

**Subject:** RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237] CORRECTION PLEASE

apologies to all for operator error, and causing double vision for some.  
we prefer that you please refer to and, if you so desire, continue this string.

Hello Jim-

Just a brief recap of yesterday's call; subject, of course to your considered commentary.

## 1. Document Production

### a. Present Requests-

We are evaluating the data provided only yesterday, below, and at this time we only ask for a clarification of your comments following your bullet-point of the INDA, repeated here:

**The INDA for OxyContin: PDD8002000001 to PDD8002219555 (Every document in this range may not be part of the INDA, but the INDA documents are included in this range)**

We appreciate Debtors' efforts, but we also believe it reasonable to ask Debtors to provide (1) an Index of your specified data range (221,000+ pages) and, similarly, (2) isolate/designate the INDA documents, by range number(s). We make this simple request as a matter of (i) attention to detail, (ii) convenience for all, and (iii) for avoidance of any doubts or misunderstandings.

We all share a common goal of getting this right and maintaining accuracy.

b. Yesterday, we informed you that we took up Debtors' suggestion that we contact Side 'A' and Side 'B' regarding the requests and, generally, the subject matter. We further advised Debtors of the recent establishment by and between NAS Ad Hoc and Side 'A' and Side 'B' of simple guidelines for processing NAS Ad Hoc requests made upon Side 'A' and 'B' (essentially through the UCC prior to pursuing alternatives), and we left it that Debtors may consider proposing similar guidelines during a future communication. NAS Ad Hoc expresses no opinion whether including UCC is in Debtors' interests.

## 2. Mundipharma

Regarding our requests that Debtors identify the law firm(s) representing the legal interests of Mundipharma most qualified to confer with the NAS Ad Hoc regarding Scientific information and related subjects, sufficient time for accomplishing this simple task has (imo) transpired and, accordingly, we only ask that Debtors endeavor to get a

response-- even if it is to advise us of Debtors' inability or unwillingness to do so --by no later than Wednesday, Nov. 25, 2020 (that would provide Debtors a full week since our first communication requesting the info.)

3. *Ex Parte* Motion

Regarding the NAS Ad Hoc's ex parte application, it is NAS Ad Hoc's intention to file it without further notice; nevertheless, as a further courtesy to Debtors, we now advise that it may include additional materials and information not contained within the '11/11/20' draft that Debtors had been previously furnished (also as a courtesy).

Please let us know how you want to proceed regarding items 1 and 2, above.

Many thanks,

Donald Creadore

o/b/o Purdue NAS Ad Hoc Children

Donald E. Creadore  
The Creadore Law Firm, P.C.  
450 Seventh Avenue - Suite 1408  
New York, New York 10123

(O) 212.355.7200  
(C) 917.226.1881

-----Original Message-----

From: "McClammy, James I." <james.mcclammy@davispolk.com>

Sent: Friday, November 20, 2020 8:28am

To: "Harold D. Israel" <hisrael@lplegal.com>

Cc: "Oluwole, Chautney M." <chautney.oluwole@davispolk.com>, "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>, "Townes, Esther C." <esther.townes@davispolk.com>, "apreis@akingump.com" <apreis@akingump.com>, "Brauner, Sara" <sbrauner@akingump.com>, "Salwen, James" <jsalwen@akingump.com>, "Kevin Thompson" <kwthompsonwv@thompsonbarneylaw.com>, "Scott Bickford" <sbickford@mbfirm.com>, "Kent Robbins" <khrobbins@kentharrisonrobbins.com>, "Will Kovalchik" <willkoyal@gmail.com>, "Donald Creadore" <donald@creadorelawfirm.com>, "Scott Markowitz" <SMarkowitz@tarterkrinsky.com>, "Hurley, Mitchell" <mhurley@akingump.com>, "Porter, Katherine" <kporter@akingump.com>, "Sheila.Birnbaum@dechert.com" <Sheila.Birnbaum@dechert.com>, "Hayden.Coleman@dechert.com" <Hayden.Coleman@dechert.com>, "Danielle.GentinStock@dechert.com" <Danielle.GentinStock@dechert.com>, "Yeary, Michelle" <michelle.yeary@dechert.com>

Subject: RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

All—

In advance of our call, we thought it would be helpful to list in one place the “scientific information” we have provided and/or pointed you to to date. As discussed on our call on Monday, we believe the custodians and search terms that have been run to date were/are broad enough to have captured the types of information you are requesting, to the extent it exists in the debtors files. I believe you have access to all of this already through your access to the MDL/civil litigation databases.

- The complete set of NDA files for OxyContin, Hysingla ER, and Butrans. OxyContin: PURCHI-000008528 to PURCHI-003282833 (This can be found at several Bates-ranges because it was produced more than once). Hysingla ER: POK000827212 to POK001852069. Butrans: POK001852071 to POK003274809
  - Note: These include all of the company’s FDA submissions, which would include as applicable, submissions related to licensing and approvals of Purdue’s opioid medications.
- The INDA for OxyContin: PDD8002000001 to PDD8002219555 (Every document in this range may not be part of the INDA, but the INDA documents are included in this range)
- Studies related to oxycodone:
  - DSE-151- In Vitro Chromosomal aberration - PDD1701693617.
  - DSE-060- Reproductive (embryo-fetal—Segment II) Range-Finding Study- Rat - PDD170377016- (2-54) AND PDD1701377332 (209-325).
  - DSE- 061- Reproductive (embryo-fetal—Segment II)- Rat - DSE-061- PDD1701377016 (55-313) AND PDD1701376694 (2-106).
  - DSE-058- Reproductive (embryo-fetal—Segment II) Range-Finding Study- Rabbit - DSE-058- PDD1701376694 (107-257); see also PDD1701694266 (IRDC).
  - DSE-059- Reproductive (embryo-fetal—Segment II)- Rabbit - DSE-059- PDD1701376694 (256-317) AND PDD1701376376 (2-236) AND PDD1701694884 (IRDC).
- Documents from Purdue’s publications database, which reflect Purdue’s internal review of scientific research by Purdue or Purdue employees being evaluated for publication. PPLP003491632 through PPLP004166152.
- Reprints of scientific publications that were approved for distribution to prescribers by sales representatives for the period November 1, 2008 to January 30, 2017. PURCHI-003282840 to PURCHI-003282944.
- Adverse Event Reports, which include clinical observations of *in utero* exposure, if any, to the compounds under study: PPLP004385541 through PPLP004390686.
- Med Watch Reports: Included in PPLPCNC500588670 through PPLPCNC500589138.

In addition, given the search terms applied, it is possible scientific research can be found within the custodial productions.

We can discuss this further on our call this morning. As noted on our Monday call, it is not the case that we have only produced what was provided to FDA and that we are unwilling to search for the information you are requesting (as was suggested in an email to Sheila). Rather, we believe that what has been done to date more than sufficiently covers the requests you have made to the extent such documents are within the debtors’ possession and that further expense and effort is not likely to yield anything meaningful.

Best,

J.I.M.

**James I. McClammy**

**Davis Polk & Wardwell LLP**

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**From:** Harold D. Israel <[hisrael@lplegal.com](mailto:hisrael@lplegal.com)>  
**Sent:** Monday, November 16, 2020 6:38 PM  
**To:** McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Cc:** Oluwole, Chautney M. <[chautney.oluwole@davispolk.com](mailto:chautney.oluwole@davispolk.com)>; Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>; [apreis@akingump.com](mailto:apreis@akingump.com); Brauner, Sara <[sbrauner@akingump.com](mailto:sbrauner@akingump.com)>; Salwen, James <[jsalwen@akingump.com](mailto:jsalwen@akingump.com)>; Kevin Thompson <[kwthompsonwv@thompsonbarneylaw.com](mailto:kwthompsonwv@thompsonbarneylaw.com)>; Scott Bickford <[sbickford@mbfirm.com](mailto:sbickford@mbfirm.com)>; Kent Robbins <[khrobbins@kentharrisonrobbins.com](mailto:khrobbins@kentharrisonrobbins.com)>; Will Kovalchik <[willkoval@gmail.com](mailto:willkoval@gmail.com)>; Donald Creadore <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)> <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)>; Scott Markowitz <[SMarkowitz@tarterkrinsky.com](mailto:SMarkowitz@tarterkrinsky.com)>; Hurley, Mitchell <[mhurley@akingump.com](mailto:mhurley@akingump.com)>; Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>; [Sheila.Birnbaum@dechert.com](mailto:Sheila.Birnbaum@dechert.com); [Hayden.Coleman@dechert.com](mailto:Hayden.Coleman@dechert.com); [Danielle.GentinStock@dechert.com](mailto:Danielle.GentinStock@dechert.com); Yeary, Michelle <[michelle.yeary@dechert.com](mailto:michelle.yeary@dechert.com)>  
**Subject:** RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

9:00 am eastern on Friday works for the NAS Ad Hoc

Harold

**HAROLD D. ISRAEL**

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**From:** McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Sent:** Monday, November 16, 2020 1:58 PM  
**To:** Harold D. Israel <[hisrael@lplegal.com](mailto:hisrael@lplegal.com)>  
**Cc:** Oluwole, Chautney M. <[chautney.oluwole@davispolk.com](mailto:chautney.oluwole@davispolk.com)>; Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>; [apreis@akingump.com](mailto:apreis@akingump.com); Brauner, Sara <[sbrauner@akingump.com](mailto:sbrauner@akingump.com)>; Salwen, James <[jsalwen@akingump.com](mailto:jsalwen@akingump.com)>; Kevin Thompson <[kwthompsonwv@thompsonbarneylaw.com](mailto:kwthompsonwv@thompsonbarneylaw.com)>; Scott Bickford <[sbickford@mbfirm.com](mailto:sbickford@mbfirm.com)>; Kent Robbins <[khrobbins@kentharrisonrobbins.com](mailto:khrobbins@kentharrisonrobbins.com)>; Will Kovalchik <[willkoval@gmail.com](mailto:willkoval@gmail.com)>; Donald Creadore <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)> <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)>; Scott Markowitz <[SMarkowitz@tarterkrinsky.com](mailto:SMarkowitz@tarterkrinsky.com)>; Hurley, Mitchell <[mhurley@akingump.com](mailto:mhurley@akingump.com)>; Porter, Katherine <[kporter@akingump.com](mailto:kporter@akingump.com)>; [Sheila.Birnbaum@dechert.com](mailto:Sheila.Birnbaum@dechert.com); [Hayden.Coleman@dechert.com](mailto:Hayden.Coleman@dechert.com); [Danielle.GentinStock@dechert.com](mailto:Danielle.GentinStock@dechert.com); Yeary, Michelle <[michelle.yeary@dechert.com](mailto:michelle.yeary@dechert.com)>  
**Subject:** Re: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

I have depositions Thursday and Friday, but could do Friday morning, early (8:30 or 9:00 Eastern) if that works for others.

On Nov 16, 2020, at 2:23 PM, Harold D. Israel <[hisrael@lplegal.com](mailto:hisrael@lplegal.com)> wrote:

We are not available.

Have availability Thursday afternoon or Friday am

Thanks

Harold

**HAROLD D. ISRAEL**

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**From:** Oluwole, Chautney M. <[chautney.oluwole@davispolk.com](mailto:chautney.oluwole@davispolk.com)>

**Sent:** Monday, November 16, 2020 12:18 PM

**To:** Harold D. Israel <[hisrael@lplegal.com](mailto:hisrael@lplegal.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>; Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>

**Cc:** [apreis@akingump.com](mailto:apreis@akingump.com); 'Brauner, Sara' <[sbrauner@akingump.com](mailto:sbrauner@akingump.com)>; 'Salwen, James' <[jsalwen@akingump.com](mailto:jsalwen@akingump.com)>; 'Kevin Thompson' <[kwthompsonwv@thompsonbarneylaw.com](mailto:kwthompsonwv@thompsonbarneylaw.com)>; 'Scott Bickford' <[sbickford@mbfirm.com](mailto:sbickford@mbfirm.com)>; 'Kent Robbins' <[khrobbins@kentharrisonrobbins.com](mailto:khrobbins@kentharrisonrobbins.com)>; 'Will Kovalchik' <[willkoval@gmail.com](mailto:willkoval@gmail.com)>; 'Donald Creadore' <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)>; 'Scott Markowitz' <[SMarkowitz@tarterkrinsky.com](mailto:SMarkowitz@tarterkrinsky.com)>; 'Hurley, Mitchell' <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; 'Porter, Katherine' <[kporter@akingump.com](mailto:kporter@akingump.com)>; [Sheila.Birnbaum@dechert.com](mailto:Sheila.Birnbaum@dechert.com); [Hayden.Coleman@dechert.com](mailto:Hayden.Coleman@dechert.com); [Danielle.GentinStock@dechert.com](mailto:Danielle.GentinStock@dechert.com); Yearly, Michelle <[michelle.yearly@dechert.com](mailto:michelle.yearly@dechert.com)>

**Subject:** RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Thanks, Harold. Could you please let us know your team's availability for a follow up call this Friday afternoon?

**Chautney M. Oluwole**

**Davis Polk & Wardwell LLP**

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[chautney.oluwole@davispolk.com](mailto:chautney.oluwole@davispolk.com)

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**From:** Harold D. Israel <[hisrael@lplegal.com](mailto:hisrael@lplegal.com)>

**Sent:** Monday, November 16, 2020 12:04 PM

**To:** McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>; Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>

**Cc:** [apreis@akingump.com](mailto:apreis@akingump.com); 'Brauner, Sara' <[sbrauner@akingump.com](mailto:sbrauner@akingump.com)>; 'Salwen, James' <[jsalwen@akingump.com](mailto:jsalwen@akingump.com)>; 'Kevin Thompson' <[kwthompsonwv@thompsonbarneylaw.com](mailto:kwthompsonwv@thompsonbarneylaw.com)>; 'Scott Bickford' <[sbickford@mbfirm.com](mailto:sbickford@mbfirm.com)>; 'Kent Robbins' <[khrobbins@kentharrisonrobbins.com](mailto:khrobbins@kentharrisonrobbins.com)>; 'Will Kovalchik' <[willkoval@gmail.com](mailto:willkoval@gmail.com)>; 'Donald Creadore' <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)>; 'Scott Markowitz' <[SMarkowitz@tarterkrinsky.com](mailto:SMarkowitz@tarterkrinsky.com)>; 'Hurley, Mitchell' <[mhurley@AkinGump.com](mailto:mhurley@AkinGump.com)>; 'Porter, Katherine' <[kporter@akingump.com](mailto:kporter@akingump.com)>; Oluwole, Chautney M. <[chautney.oluwole@davispolk.com](mailto:chautney.oluwole@davispolk.com)>; [Sheila.Birnbaum@dechert.com](mailto:Sheila.Birnbaum@dechert.com)

**Subject:** RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Jim and Sheila:

Thank you for your time today. We look forward to your response by noon eastern on November 20, 2020.

Harold

**HAROLD D. ISRAEL**

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**From:** Harold D. Israel

**Sent:** Saturday, November 14, 2020 3:14 PM

**To:** 'McClammy, James I.' <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>; 'Knudson, Jacquelyn Swanner' <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; 'Townes, Esther C.' <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>

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<[kporter@akingump.com](mailto:kporter@akingump.com)>; 'Oluwole, Chautney M.' <[chautney.oluwole@davispolk.com](mailto:chautney.oluwole@davispolk.com)>

**Subject:** RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Jim:

Do we have a time? Updated Availability (eastern):

11-12

1:2:30

3:30-5:00



Harold

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**From:** Harold D. Israel  
**Sent:** Friday, November 13, 2020 12:48 PM  
**To:** McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>; Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>  
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**Subject:** RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Jim:

Thank you. We are available on Monday as follows (eastern):

10-12  
1:2:30  
3:30-5:00

Harold

---

**From:** McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>  
**Sent:** Friday, November 13, 2020 12:35 PM  
**To:** Harold D. Israel <[hisrael@lplegal.com](mailto:hisrael@lplegal.com)>; Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>  
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**Subject:** RE: NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]

Harold –

Thank you for your email and for sending the drafts. We are reviewing and will be discussing this with the clients. It would be helpful for me to get a better understanding of the point made about this discovery being needed to advance the settlement that was reached. I am tied up today, but could be available over the weekend or early Monday morning. Let me know if there is a time that works best for you and I can give you a call.

J.I.M.

---

**From:** Harold D. Israel <[hisrael@lplegal.com](mailto:hisrael@lplegal.com)>  
**Sent:** Thursday, November 12, 2020 12:38 PM  
**To:** McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>; Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; Townes, Esther C. <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>  
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**Subject:** NAS Ad HOC -Opioid - 2004 Motion- 11.12.20 with exhibits [LPLEGAL-Emails.FID1431237]  
**Importance:** High

DP Team:

At the NAS Ad Hoc's request, attached please find unredacted drafts of discovery that the NAS Ad Hoc intends on filing on November 16.

Please let us know if you wish to have an additional meet and confer prior to filing.

Harold

**HAROLD D. ISRAEL**

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